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PLAINTIFF'S STATUS REPORT

TO THE HONORABLE COURT:

COMES NOW Plaintiff's counsel, Steve N. Hall to submit the status of settlement negotiations with opposing counsel and will report as follows:

1. Plaintiff's attorney contacted opposing counsel at approximately 2:25 p.m. on January 13, 2014. Mr. Alex Yarborough indicated that he was aware of the status report deadline, but he could not speak to the Defendants' intentions and would return call if possible.
2. Counsel for Defendants, Ms. Lee Ann Reno contacted the undersigned counsel by phone at approximately 2:45 p.m., and she indicated the Defendants had no intentions as to settlement.
3. Undersigned counsel informed opposing counsel the Plaintiff will be prepared for trial as Defendants did not wish to negotiate a settlement.
4. Plaintiff's attorney reminded opposing counsel of the logistics involved obtaining a visa for the return of Plaintiff, Jairo Pina-Rodriquez to the United States for a jury trial.

5. The Plaintiff's attorney informed opposing counsel that the United States Customs and Immigration Service (USCIS) will need to approve an I-918 Form and I-918 supplement before Jairo Pina-Rodriguez could be returned to the United States.

6. Plaintiff's attorney informed opposing counsel that cooperation from the United States Attorney General, Immigration Customs and Enforcement (ICE), or the Court will be required to obtain a visa for "extraordinary relief" if Plaintiff, Jairo Pina-Rodriguez is to return to the United States.

7. The Plaintiff's attorney informed opposing counsels that if the Court ordered mediation within thirty (30) days of the status report that the logistics for obtaining Plaintiff's visa or in the alternative a video deposition may require an alternative schedule.

8. Opposing counsel, Ms. Reno offered to send a stipulated conference report to undersigned counsel. The undersigned counsel accepted opposing counsels offer to provide a stipulated report that would indicate the Defendants did not desire to settle the case.

9. Subsequently after several emails from Mr. Yarborough, the undersigned counsel received the stipulated report to which Ms. Reno referred. Prior to the receipt of same, the undersigned counsel received an email from Ms. Reno with notice of deposition scheduled for February 6, 2014. The date of the deposition was not discussed with undersigned counsel during the phone conference. The February 6, 2024 date conflicts with undersigned counsel's scheduled appearance in Dallas County criminal court.

10. The undersigned counsel left the office before the opposing counsel provided the stipulated report. Upon receipt of the status report, the Plaintiff's attorney informed staff to request opposing counsel withdraw the name of mediator, Tad Fowler as no

agreement to mediate was discussed save to inform undersigned counsel of the Court's normal procedure.

11. The Plaintiff's attorney agreed to a "joint" status report that stipulated the Defendants had no desire to negotiate a settlement.

Respectfully submitted

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